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and Father Martin D. Rooney

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JIONNI CONFORTI,

Plaintiff,

v.

ST. JOSEPH'S HEALTHCARE SYSTEM,  
INC.; ST. JOSEPH'S HOSPITAL AND  
MEDICAL CENTER D/B/A ST. JOSEPH'S  
REGIONAL MEDICAL CENTER; and  
FATHER MARTIN D. ROONEY,

Defendants.

Honorable Claire C. Cecchi, U.S.D.J.

Honorable Cathy L. Waldor, U.S.M.J.

Case No. 2:17-cv-00050 (CCC/CLW)

**NOTICE OF DEFENDANTS' MOTION FOR  
RECONSIDERATION OF THE COURT'S  
OPINION AND ORDER DENYING  
DEFENDANTS' MOTION TO COMPEL  
MENTAL EXAMINATION OF PLAINTIFF**

TO: Tom Barnes, Esq.  
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Quinn Emanuel Urquhart & Sullivan, LLP  
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120 Wall Street, 19th Floor  
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**PLEASE TAKE NOTICE** that on March 2, 2020, at 9:00 a.m., or as soon thereafter as  
counsel may be heard, Defendants St. Joseph's Health, Inc., St. Joseph's University Medical

Center, Inc., and Father Martin D. Rooney (collectively, “Defendants”), shall move this Court pursuant to Fed. R. Civ. P. 60(b) and L. Civ. R. 7.1(i), for entry of an order reconsidering the Court’s January 22, 2020, Order and Opinion denying Defendants’ motion to compel the mental examination of Plaintiff Jionni Conforti pursuant to Fed. R. Civ. P. 35(a) and 37.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion Defendants will rely on the Declaration of Christopher S. Mayer, Esq., Declaration of Donald Raymond Reeves, Jr., M.D., and Brief submitted in Support of the Motion for Reconsideration.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order accompanies this Notice of Motion.

Respectfully submitted,

**McCARTER & ENGLISH, LLP**

Attorneys for Defendants St. Joseph’s Health,  
Inc., St. Joseph’s University Medical Center,  
Inc., and Father Martin D. Rooney

By: s/Christopher S. Mayer

Christopher S. Mayer  
Thomas F. Doherty

Dated: February 5, 2020